

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**JOINT STIPULATION BY AND AMONG THE DEBTORS  
AND SUZIE CHANG DEEMING PROOF OF CLAIM TIMELY FILED**

This joint stipulation (“Stipulation”) is made and entered into by and among (a) Yellow Corporation and the other debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”)<sup>2</sup> and (b) Suzie Chang (“Chang,” and together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

## RECITALS

WHEREAS, on August 6, 2023 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtors’ chapter 11 cases are being jointly administered for procedural purposes. The Debtors are managing their businesses and their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors' chapter 11 cases, is set forth in the *Declaration of Matthew A. Doheny, Chief Restructuring Officer of Yellow Corporation, in Support of the Debtors' Chapter 11 Petitions and First Day Motions* [Docket No. 14] (the "First Day Declaration").

WHEREAS, on September 13, 2023, the Court entered an order (the “Bar Date Order”) establishing November 13, 2023, as the general claims bar date for filing proofs of claim (the “Bar Date”).

WHEREAS, Chang makes arguments that she believes would justify the Court treating her proof of claim as timely filed by the Bar Date.

WHEREAS, in an effort to avoid the delay and expenses of litigation, and following arms’ length discussions between the Parties, the Debtors have agreed not to object to Chang’s late proof of claim, filed on February 22, 2024 (claim number 5939) (the “Chang POC”) on the basis that it was filed after the Bar Date, but reserve the right to object to the Chang POC on all other grounds and reserve the right to object to all other proofs of claim that were not filed prior to the Bar Date on timeliness grounds.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED as follows:

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. The Chang POC is agreed to have been timely filed prior to the Bar Date.
3. All parties in interest reserve their rights to object to the Chang POC on any other basis, other than that it was filed after the Bar Date.
4. All parties in interest reserve their rights to object to any other proof of claim on timeliness grounds, and this Stipulation shall have no impact on the timeliness of such other proofs of claim
5. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

6. While Chang may incur costs, fees (including attorneys' fees), expenses, or charges associated with entering into and performing under this Stipulation, Chang and her counsel agree they shall not seek to recover any such fees and/or costs from the Debtors or their estates.

7. Neither this Stipulation, nor any terms contained herein shall be offered in evidence in any legal proceeding or administrative proceeding among or between the Parties, other than as may be necessary to obtain approval of and/or to enforce this Stipulation.

8. The Parties agree that nothing in this Stipulation precludes any party in interest from objecting to any other proof of claim that is tardily filed, other than the Chang POC.

9. This Stipulation is subject to the approval of the Court and shall only be effective upon entry of a Court order approving this Stipulation (the "Order"). The Parties hereby consent to the entry of the Order and waive any right to notice or hearing on the approval of the Stipulation.

10. The Court retains exclusive jurisdiction with respect to any disputes arising from or other actions to interpret, administer, or enforce the terms and provisions of this Stipulation.

**STIPULATED AND AGREED TO THIS 27th DAY OF FEBRUARY 2024.**

Dated: February 27, 2024  
Wilmington, Delaware

/s/ Laura Davis Jones

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